

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF ALABAMA,

PLAINTIFF

V.

**SEVENTY FOUR THOUSAND SEVEN
HUNDRED (\$74,700) DOLLARS IN U.S.
CURRENCY,**

DEFENDANT.

*
*
*
*
*
*
*
*
*
*

CASE NO. 2:06-cv-736-WKW

MOTION TO STAY PROCEEDINGS

Comes now the defendant, by and through counsel, and moves the Court to Stay Proceedings in this cause pursuant to Title 18 § 981 (g)(2)(A) and as grounds therefore says as follows:

1. The government has asked to take the deposition of claimant George Jones.
2. There is currently pending in the Circuit Court of Montgomery County, Alabama a criminal charge (CC-06-885) arising from the same facts and circumstances as the seizure of the funds made subject of this action.
3. Continuation of this action will burden the right of claimant against self-incrimination in the State criminal case.

Respectfully submitted this the 10th day of January, 2007.

s/Bruce Maddox
Bruce Maddox (MAD013)
Attorney for George Jones
6728 Taylor Court
Montgomery, Alabama 36117
Phone: (334) 244-7333
Fax: (334) 260-9600

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of January, 2007, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to appropriate parties.

s/Bruce Maddox
Of Counsel